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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**In re:**

**TARRANT COUNTY SENIOR LIVING  
CENTER, INC., D/B/A THE STAYTON  
AT MUSEUM WAY <sup>1</sup>**

**Debtor.**

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**CHAPTER 11**

**CASE NO. 24-80068-swe11**

**AMENDED AGENDA FOR HEARING OF MATTERS SCHEDULED  
FOR OCTOBER 2, 2024, AT 3:00 P.M. (PREVAILING CENTRAL TIME)**

The above-captioned debtor and debtor-in-possession (the “**Debtor**”) hereby files this agenda for matters set for hearing on **October 2, 2024, at 3:00 p.m. (prevailing Central time)**, before the Honorable Judge Scott W. Everett at the United States Bankruptcy court for the Northern District of Texas via Webex at <https://us-courts.webex.com/meet/Everett>; Webex dial-in: (US/Canada) 1-650-479-3207; Access code: 2304 017 9738.

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 8602.

**AGENDA MATTERS**

1. *Notice of Designation as Complex Chapter 11 Bankruptcy Case* [Docket No. 2]

**Related Documents:**

- a. *Voluntary Petition for Tarrant County Senior Living Center, Inc.* [Docket No. 1]
- b. *Amended Declaration of Jeff Gentry in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 34]
- c. *Notice of Emergency Hearing for October 2, 2024 Setting* [Docket No. 30]

**Status:** This matter is going forward on an uncontested basis subject to passage of the objection deadline.

2. *Emergency Motion of the Debtor for Interim and Final Orders (I) Authorizing the Debtor to Use the Cash Collateral of BOKF, N.A., as Trustee; (II) Providing BOKF, N.A., as Trustee, Adequate Protection; (II) Providing Superpriority Administrative Expense Claims; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief*[Docket No. 3];

**Related Documents:**

- a. *Amended Declaration of Jeff Gentry in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 34]
- b. *Notice of Emergency Hearing for October 2, 2024 Setting* [Docket No. 30]

**Status:** This matter is going forward on an uncontested basis subject to passage of the objection deadline.

3. *Debtor's Emergency Motion for Entry of Interim and Final Orders Authorizing, But Not Directing, the Debtor to Continue Its Prepetition Business Operations, Policies, and Practices and Pay Related Claims in the Ordinary Course of Business on a Postpetition Basis* [Docket No. 9];

**Related Documents:**

- a. *Amended Declaration of Jeff Gentry in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 34]
- b. *Notice of Emergency Hearing for October 2, 2024 Setting* [Docket No. 30]

**Status:** This matter is going forward on an uncontested basis subject to passage of the objection deadline.

4. *Emergency Application of the Debtor for an Order Authorizing the Employment and Retention of Kroll Restructuring Administration LLC as Claims, Noticing, and Solicitation Agent Nunc Pro Tunc to the Petition Date* [Docket No. 17]

**Related Documents:**

- a. *Amended Declaration of Jeff Gentry in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 34]
- b. *Notice of Emergency Hearing for October 2, 2024 Setting* [Docket No. 30]

**Status:** This matter is going forward on an uncontested basis subject to passage of the objection deadline.

5. *Emergency Motion of the Debtor for Entry of Final Order (I) Authorizing the Debtor to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, Change, or Enter Into New Insurance Policies, and (II) Granting Certain Related Relief* [Docket No. 5];

**Related Documents:**

- a. *Amended Declaration of Jeff Gentry in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 34]
- b. *Notice of Emergency Hearing for October 2, 2024 Setting* [Docket No. 30]

**Status:** This matter is going forward on an uncontested basis subject to passage of the objection deadline.

6. *Emergency Motion of the Debtor for Entry of an Order (I) Authorizing the Debtor to (A) Pay Certain Prepetition Salaries, Wages, and Compensation and (B) Continue Employee Benefit Programs and (II) Directing Banks to Honor and Process Checks and Transfers Related to Such Employee Obligations* [Docket No. 8];

**Related Documents:**

- a. *Amended Declaration of Jeff Gentry in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 34]
- b. *Notice of Emergency Hearing for October 2, 2024 Setting* [Docket No. 30]

**Status:** This matter is going forward on an uncontested basis subject to passage of the objection deadline.

7. *Emergency Motion of the Debtor for Entry of an Order Authorizing the Implementation of (I) Procedures to Maintain and Protect Confidential Resident and Patient Information,*

*(II) Procedures to Protect Other Individual Information, and (III) Authorizing Service by Email on Parties in Interest* [Docket No. 10];

**Related Documents:**

a. *Amended Declaration of Jeff Gentry in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 34]

b. *Notice of Emergency Hearing for October 2, 2024 Setting* [Docket No. 30]

**Status:** This matter is going forward on an uncontested basis subject to passage of the objection deadline.

8. *Emergency Motion of the Debtor for Entry of an Order Authorizing Debtor to Employ Professionals Used in Ordinary Course of Business Effective as of Petition Date* [Docket No. 11]

**Related Documents:**

a. *Amended Declaration of Jeff Gentry in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 34]

b. *Notice of Emergency Hearing for October 2, 2024 Setting* [Docket No. 30]

**Status:** This matter is going forward on an uncontested basis subject to passage of the objection deadline.

9. *Debtor's Emergency Motion for Entry of Interim and Final Orders Authorizing the Debtor to Pay Certain Prepetition Taxes* [Docket No. 7];

**Related Documents:**

a. *Amended Declaration of Jeff Gentry in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 34]

b. *Notice of Emergency Hearing for October 2, 2024 Setting* [Docket No. 30]

**Status:** This matter is going forward on an uncontested basis subject to passage of the objection deadline.

10. *Emergency Motion of the Debtor for Entry of an Order Authorizing (I) Continued Use of Existing Cash Management System, (II) Maintenance of Existing Bank Accounts, (III) Continued Use of Existing Business Forms, and (IV) the Waiver of the 11 U.S.C. § 345(b) Deposit and Investment Requirements* [Docket No. 4];

**Related Documents:**

a. *Amended Declaration of Jeff Gentry in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 34]

b. *Notice of Emergency Hearing for October 2, 2024 Setting* [Docket No. 30]

**Status:** This matter is going forward on an uncontested basis subject to passage of the objection deadline.

11. *Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (II) Deeming the Utility Providers Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Requests for Additional Adequate Assurance* [Docket No. 6];

**Related Documents:**

a. *Amended Declaration of Jeff Gentry in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 34]

b. *Notice of Emergency Hearing for October 2, 2024 Setting* [Docket No. 30]

**Status:** This matter is going forward on an uncontested basis subject to passage of the objection deadline.

12. *Emergency Motion of the Debtor for Entry of an Order (I) Extending Time for Debtor to File Its Schedules and Statements and (II) Permanently Waiving Same Upon Confirmation of Debtor's Prepackaged Plan of Reorganization* [Docket No. 12];

**Related Documents:**

a. *Amended Declaration of Jeff Gentry in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 34]

b. *Notice of Emergency Hearing for October 2, 2024 Setting* [Docket No. 30]

**Status:** This matter is going forward on an uncontested basis subject to passage of the objection deadline.

13. *Emergency Motion of the Debtor for Entry of an Order (I) Scheduling Combined Hearing on (A) Adequacy of Disclosure Statement and (B) Confirmation of Prepackaged Plan of Reorganization; (II) Fixing Related Objection Deadlines and Approving Notice Procedures; (III) Approving Prepetition Solicitation Procedures; (IV) Conditionally Directing the United States Trustee Not To Convene Section 341(a) Meeting of Creditors; and (V) Granting Related Relief* [Docket No. 13]

**Related Documents:**

- a. *Amended Declaration of Jeff Gentry in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 34]
- b. *Notice of Emergency Hearing for October 2, 2024 Setting* [Docket No. 30]

**Status:** This matter is going forward on an uncontested basis subject to passage of the objection deadline.

RESPECTFULLY SUBMITTED this 1st day of October 2024.

By: Martin A. Sosland  
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**CERTIFICATE OF SERVICE**

I, Martin A. Sosland, certify that the foregoing *Amended Agenda for Hearing of Matters Scheduled for October 2, 2024, at 3:00 p.m. (Prevailing Central Time)* was filed electronically through the Court's ECF system and served electronically on all parties enlisted to receive service electronically.

Dated: October 1, 2024.

/s/ Martin A. Sosland  
MARTIN A. SOSLAND

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